

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JEFF McGRAW

Case No.: 23 CR 28

Judge Edmond E. Chang

JOINT STATUS REPORT

The UNITED STATES OF AMERICA, by MORRIS PASQUAL, Acting United States Attorney for the Northern District of Illinois, and defendant JEFF McGRAW, by his attorney, JOHN L. McNAMARA, P.C., hereby file this joint status report as directed by the Court's November 9, 2023 minute entry. Dkt. 66.

1. The government has produced all relevant discovery.
2. On June 2, 2023, the government sent to defense counsel a letter setting forth a preliminary guidelines calculation. In the months after sending the letter, the government and defense counsel have engaged in several telephone conversations concerning plea negotiations. Those negotiations were interrupted by defendant's medical treatment and transfer to a different correctional center.
3. On October 30, 2023, the government sent to defense counsel a draft plea agreement.

4. Defense counsel has conferred with defendant on multiple occasions regarding the draft plea agreement sent by the government, most recently on November 16, 2023.

5. Defense counsel intends to file a motion to dismiss the indictment on the grounds that 18 U.S.C. § 922(g)(1) violates the Second Amendment. *See, e.g., United States v. Glen Prince*, Case No. 22 CR 240, Dkt. 73 (N.D. Ill. Nov. 2, 2023).

6. Plea negotiations are no longer ongoing. The government respectfully requests the Court set a trial date within the next 60 to 90 days. The government anticipates that its presentation at trial will take approximately three days.

7. The parties agree to the continued exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7), in the interest of justice to permit defense counsel to file pretrial motions and to permit the parties to prepare for trial.

Respectfully submitted,

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